

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

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JULIE A. SU,	:	
Acting Secretary of Labor,	:	
United States Department of Labor	:	No. 1:23-cv-02119-NRM-MMH
<i>Plaintiff,</i>	:	(ECF Case)
	:	
-against-	:	
	:	
ADVANCED CARE STAFFING, LLC, et al.,	:	
	:	
<i>Defendants.</i>	:	

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**MOTION TO WITHDRAW AND REQUEST TO SO-ORDER**

TO THE CLERK OF THIS COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, David N. Kelley and O'Melveny & Myers LLP respectfully request to be withdrawn as counsel of record in this matter and request removal from service of any further pleadings in connection with it. David N. Kelley and O'Melveny & Myers LLP confirm they are not asserting a retaining or charging lien. David N. Kelley and O'Melveny & Myers LLP further confirm that Advanced Care Staffing, LLC, Priority Care Staffing, LLC, and Samuel Klein were aware of, and consented to, their withdrawal as counsel of record in this matter. For the avoidance of doubt, David N. Kelley and O'Melveny & Myers LLP are serving a copy of this motion to withdraw on Advanced Care Staffing, LLC, Priority Care Staffing, LLC, and Samuel Klein contemporaneously with its filing. Defendants Advanced Care Staffing LLC, Priority Care Staffing, LLC, and Samuel Klein will continue to be ably represented by counsel of record.

Dated: New York, New York  
May 8, 2024

O'Melveny & Myers LLP

By: /s/ David N. Kelley  
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**SO ORDERED**

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The Honorable Nina R. Morrison  
United States District Judge